<u>REMARKS/ARGUMENTS</u>

In the Office Action mailed August 23, 2007, (hereinafter, "Office Action") claims 1-17 stand rejected under 35 U.S.C. § 103. Claims 1-3, 5, 12 and 16-17 have been amended.

Applicant respectfully responds to the Office Action.

I.   <u>Claim Objections</u>

Claims 1-17 stand objected to as including informalities. Claims 1-3, 5, 12 and 16-17 have been amended to correct the informalities as suggested by the Office Action. Applicant respectfully requests that the objection of claims 1-17 be withdrawn.

II.   <u>Claims 1-17 Rejected Under 35 U.S.C. § 103</u>

Claims 1-17 stand rejected to under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2003/0041238 to French et al. (hereinafter, "French") in view of U.S. Patent Application Publication No. 2003/0088654 to Wilson, Jr. (hereinafter, "Wilson"). This rejection is respectfully traversed.

The factual inquiries that are relevant in the determination of obviousness are determining the scope and contents of the prior art, ascertaining the differences between the prior art and the claims in issue, resolving the level of ordinary skill in the art, and evaluating evidence of secondary consideration. <u>KSR Int'l Co. v. Teleflex Inc.</u>, 550 U.S. ___, 2007 U.S. LEXIS 4745, at **4-5 (2007) (<u>citing</u> <u>Graham v. John Deere Co. of Kansas City</u>, 383 U.S. 1, 17-18 (1966)). To establish a *prima facie* case of obviousness, the prior art references "must teach or suggest all the claim limitations." M.P.E.P. § 2142. Moreover, the analysis in support of an obviousness rejection "should be made explicit." <u>KSR</u>, 2007 U.S. LEXIS 4745, at **37. "[R]ejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness." <u>Id</u>. (<u>citing</u> <u>In re Kahn</u>, 441 F.3d 977, 988 (Fed. Cir. 2006)).

Applicant respectfully submits that the claims at issue are patentably distinct from the cited references. The cited references do not teach or suggest all of the subject matter in these claims.

Claim 1 recites "automatically discovering printer drivers by the printer administration utility, wherein the automatic discovering of printer drivers includes the discovery of updated drivers." French, alone or in combination with Wilson, does not teach or suggest this subject matter.

Instead French states:

> Customer address manager service 1116 queries IPOP 1112 during operations that allow an administrator to resolve addressability problems. Customer logical network creator 1118 fetches administrator input about the groupings of physical networks into a logical network, as may be provided by an administrator through an application GUI, such as the GUI shown in FIG. 13. From this input, the various scopes of the physical networks are combined to create a logical scope as previously described above.

French, paragraph [0219].

Querying IPOP during operations does not teach or suggest "automatically discovering printer drivers by the printer administration utility." Rather, the IPOP is queried to "allow an administrator to resolve addressability problems." In addition, a "customer address manager service" does not teach or suggest a "printer administration utility." In fact, there is no teaching or suggestion by French that the "customer address manager service" performs the functions that a "printer administration utility" performs.

Further, "fetch[ing] administrator input about the groupings of physical networks into a logical network" does not teach or suggest "automatically discovering printer drivers by the printer administration utility." Instead, "[f]rom this input, the various scopes of the physical networks are combined to create a logical scope." (Id.) Combining the scopes of the physical networks to create a logical scope does not teach or suggest "automatically discovering printer drivers by the printer administration utility." In fact, there is no teaching at all in the above-cited passage of French of "automatically discovering printer drivers by the printer administration utility."

The Office Action also points to paragraph [0408] of French to support the assertion that French teaches "automatically discovering printer drivers by the printer administration utility." However, Applicant respectfully points out that French does not include paragraph [0408].

Claim 1 also recites "automatically analyzing the MFP database and the driver database by the printer administration utility to determine allowable MFP/printer driver combinations." French, alone or in combination with Wilson, does not teach or suggest this subject matter.

Instead French states:

> Customer address manager service 1116 queries IPOP 1112 during operations that allow an administrator to resolve addressability problems. Customer logical network creator 1118 fetches administrator input about the groupings of physical networks into a logical network, as may be provided by an administrator through an application GUI, such as the GUI shown in FIG. 13. From this input, the various scopes of the physical networks are combined to create a logical scope as previously described above.

French, paragraph [0219].

Querying IPOP during operations does not teach or suggest "automatically analyzing the MFP database and the driver database by the printer administration utility to determine allowable MFP/printer driver combinations." Rather, the IPOP is queried to "allow an administrator to resolve addressability problems." Further, "fetch[ing] administrator input about the groupings of physical networks into a logical network" does not teach or suggest "automatically analyzing the MFP database and the driver database by the printer administration utility to determine allowable MFP/printer driver combinations." Instead, "[f]rom this input, the various scopes of the physical networks are combined to create a logical scope." (Id.) Combining the scopes of the physical networks to create a logical scope does not teach or suggest "automatically analyzing the MFP database and the driver database by the printer administration utility to determine allowable MFP/printer driver combinations." In fact, there is no teaching at all in the above-cited passage of French of determining "allowable MFP/printer driver combinations" by "analyzing the MFP database and the driver database by the printer administration utility."

In addition, as provide above, claim 1 recites "automatically discovering printer drivers" and "automatically analyzing the MFP database and the driver database." These functions are both performed by the same utility (i.e., "the printer administration utility.") However, there is no teaching or suggestion in the above cited passage of French that either the "[c]ustomer address manager service" or the "[c]ustomer logical network creator" performs both the functions of "automatically discovering printer drivers" and "automatically analyzing the MFP database and the driver database."

The Office Action also points to paragraph [0408] of French to support the assertion that French teaches "automatically analyzing the MFP database and the driver database by the printer administration utility to determine allowable MFP/printer driver combinations." However, Applicant respectfully points out that French does not include paragraph [0408].

The addition of Wilson does not overcome the deficiencies of French. The Office Action merely points to Wilson to support the assertion that Wilson teaches "a relationship database wherein an allowable MFP/printer driver combination is a printer driver and at least one MFP." (Office Action, page 3.) The Office Action does not point to, and Applicant cannot find, any teaching or suggestion by Wilson of "automatically discovering printer drivers by the printer administration utility, wherein the automatic discovering of printer drivers includes the discovery of updated drivers" and "automatically analyzing the MFP database and the driver database by the printer administration utility to determine allowable MFP/printer driver combinations."

In view of the foregoing, Applicant respectfully submits that claim 1 is patentably distinct from the cited references. Accordingly, Applicant respectfully requests that the rejection of claim 1 be withdrawn.

Claims 2-11 depend either directly or indirectly from claim 1. Accordingly, Applicant respectfully requests that the rejection of claims 2-11 be withdrawn.

Claims 12, 16 and 17 include subject matter that is similar to the subject matter of claim 1. As such, Applicant submits that claims 12, 16 and 17 are patentably distinct from the cited references
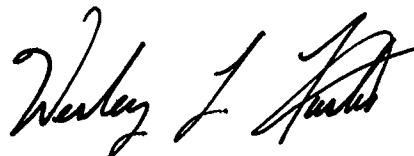
for at least the same reasons as those presented above in connection with claim 1. Accordingly, Applicant respectfully requests that the rejection of claims 12, 16 and 17 be withdrawn.

Claims 13-15 depend directly from claim 12. Accordingly, Applicant respectfully requests that the rejection of claims 13-15 be withdrawn for at least the same reasons as those presented above in connection with claim 12.

III. Conclusion

Applicant respectfully asserts that all pending claims are patentably distinct from the cited references, and request that a timely Notice of Allowance be issued in this case. If there are any remaining issues preventing allowance of the pending claims that may be clarified by telephone, the Examiner is requested to call the undersigned.

Respectfully submitted,

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